

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

\_\_\_\_\_  
SHEILA PORTER,  
Plaintiff

v.

\_\_\_\_\_  
ANDREA CABRAL, SUFFOLK  
COUNTY SHERIFF'S DEPARTMENT,  
SUFFOLK COUNTY, and  
CORRECTIONAL MEDICAL  
SERVICES, INC.  
Defendants

Civil Action No. 04-11935-DPW

**AFFIDAVIT OF MICHAEL HARRIS**

I, Michael Harris being duly sworn do hereby depose and state,

1. My name is Michael Harris and I am the Superintendent of Human Resources for the Suffolk County Sheriff's Department.
2. Among my responsibilities as Superintendent of Human Resources is the maintenance of personnel files, including discipline for current and former employees. I am also responsible for Labor/Management relations between Suffolk County and the various unions at the Suffolk County Sheriff's Department.
3. Suffolk County is the official employer of record for employees working at the Suffolk County Sheriff's Department. All Suffolk County employees working at the Suffolk County Sheriff's Department receive weekly paychecks issued by the City of Boston, Treasury Department.
4. The Suffolk County Sheriff's Department has the authority to discipline its employees for violations of its policies.

5. The Suffolk County Sheriff's Department maintains procedures for disciplining its employees.
6. The Suffolk County Sheriff's Department does not discipline contract workers, vendors, volunteers or interns nor does it maintain procedures for doing so.
7. Sheila Porter was never employed by Suffolk County at the Suffolk County Sheriff's Department. Sheila Porter was never issued a paycheck by the City of Boston, Treasury Department during the period of time that she worked at the HOC, nor was she provided with any benefits paid through the City of Boston, Treasury Department while she worked at the Suffolk County House of Correction.
8. Sheila Porter never signed an employment contract with Suffolk County or the Suffolk County Sheriff's Department.
9. The Suffolk County Sheriff's Department does not maintain a personnel file for Sheila Porter.
10. Sheila Porter was not a member of any union or collective bargaining unit at the Suffolk County Sheriff's Department.
11. Sheila Porter was not covered by the terms of any collective bargaining agreement negotiated by unions representing Suffolk County employees working at the SCSD.

Signed under the pains and penalties of perjury this fourteenth day of October 2005.

  
Michael Harris